

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CARNEGIE INSTITUTION OF
WASHINGTON and M7D CORPORATION,

Plaintiffs,

v.

PURE GROWN DIAMONDS, INC. and
IIA TECHNOLOGIES PTE. LTD. d/b/a
IIA TECHNOLOGIES,

Defendants.

Case No. 20-cv-189 (JSR)

CARNEGIE INSTITUTION OF
WASHINGTON and M7D CORPORATION,

Plaintiffs,

v.

FENIX DIAMONDS, LLC,

Defendant.

Case No. 20-cv-200 (JSR)

**DECLARATION OF J. PRESTON LONG
IN SUPPORT OF INITIAL CLAIM CONSTRUCTION BRIEF OF DEFENDANTS
PURE GROWN DIAMONDS, INC. AND IIA TECHNOLOGIES PTE. LTD.**

I, J. Preston Long, declare as follows:

1. I am an attorney with Finnegan, Henderson, Farabow, Garrett & Dunner, LLP and am counsel for Defendants Pure Grown Diamonds, Inc. and Iia Technologies Pte. Ltd in Case No. 20-cv-189 (JSR) captioned above. I submit this declaration based upon my own personal knowledge in support of the Initial Claim Construction Brief of Defendants Pure Grown Diamonds, Inc. and Iia Technologies Pte. Ltd.

2. Attached as **Exhibit A** is a true and correct copy of Excerpts from the Prosecution History of U.S. Patent No. 6,811,610 to Frushour et al. (reissued as U.S. Patent No. RE41,189 to Li et al.) (16 pages).

3. Attached as **Exhibit B** is a true and correct copy of F.P. Bundy et al., *The Pressure-Temperature Phase and Transformation Diagram for Carbon; Updated Through 1994*, 34 CARBON 141 (1996) (13 pages).

4. Attached as **Exhibit C** is a true and correct copy of the Complaint in Case No. 1:20-cv-00200 (JSR), ECF No. 1 (25 pages).

5. Attached as **Exhibit D** is a true and correct copy of Plaintiffs' Local Patent Rule 6 Disclosure to Defendants Pure Grown Diamonds, Inc. and Ila Technologies Pte. Ltd. in Case No. 1:20-cv-00189 (JSR) (23 pages).

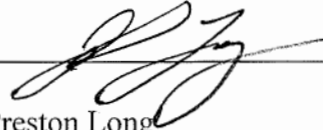
6. Attached as **Exhibit E** is a true and correct copy of Plaintiffs' Local Patent Rule 6 Disclosure to Defendant Fenix Diamonds LLC in Case No. 1:20-cv-00200 (JSR) (21 pages).

7. Attached as **Exhibit F** is a true and correct copy of excerpts from *Wiley Electrical and Electronics Engineering Dictionary* (S.M. Kaplan ed., 2004) (4 pages).

8. Attached as **Exhibit G** is a true and correct copy of excerpts from *Comprehensive Dictionary of Electrical Engineering* (P.A. LaPlante ed., 1999) (4 pages).

9. Attached as **Exhibit H** is a true and correct copy of excerpts from *The American Heritage Dictionary* (4th ed., 2001) (4 pages).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on April 8, 2020, at Potomac, MD.

A handwritten signature in black ink, appearing to read 'J. Preston Long', is written over a horizontal line.

J. Preston Long

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